

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
:
UNITED STATES OF AMERICA :
:
-v.- :
:
THOMAS SANTOS, : **SEALED INDICTMENT**
a/k/a "Chris Lee," :
a/k/a "Fat Boy," : 20 Cr. 481-UA
a/k/a "Gordo," :
a/k/a "Big Man," :
:
ADREAN COOMBS, :
a/k/a "Swells," :
:
JEFFREY GUZMAN, and :
:
VICTOR DEL VALLE, :
:
Defendants. :
:
-----X

COUNT ONE

(Narcotics Conspiracy)

1. From at least in or about September 2019 up to and including in or about September 2020, in the Southern District of New York and elsewhere, THOMAS SANTOS, a/k/a "Chris Lee," a/k/a "Fat Boy," a/k/a "Gordo," a/k/a "Big Man," ADREAN COOMBS, a/k/a "Swells," JEFFREY GUZMAN, and VICTOR DEL VALLE, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that THOMAS SANTOS, a/k/a "Chris Lee," a/k/a "Fat Boy," a/k/a "Gordo," a/k/a

"Big Man," ADREAN COOMBS, a/k/a "Swell," JEFFREY GUZMAN, and VICTOR DEL VALLE, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a) (1).

3. The controlled substance that THOMAS SANTOS, a/k/a "Chris Lee," a/k/a "Fat Boy," a/k/a "Gordo," a/k/a "Big Man," ADREAN COOMBS, a/k/a "Swell," JEFFREY GUZMAN, and VICTOR DEL VALLE, the defendants, conspired to distribute and possess with intent to distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b) (1) (A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Indictment, THOMAS SANTOS, a/k/a "Chris Lee," a/k/a "Fat Boy," a/k/a "Gordo," a/k/a "Big Man," ADREAN COOMBS, a/k/a "Swell," JEFFREY GUZMAN, and VICTOR DEL VALLE, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of

money in United States currency representing the amount of any proceeds traceable to the commission of said offense.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

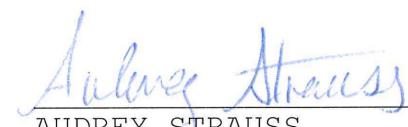
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



FOREPERSON



AUDREY STRAUSS

Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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ADREAN COOMBS,
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JEFFREY GUZMAN, and

VICTOR DEL VALLE,

Defendants.

SEALED INDICTMENT

20 Cr. _____

(21 U.S.C. § 846.)

AUDREY STRAUSS
Acting United States Attorney



Foreperson
